

BEFORE THE  
BOARD OF REGISTERED NURSING  
DEPARTMENT OF CONSUMER AFFAIRS  
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

**JULIE KAY CARMEAN, aka  
JULIE KAY REICHER, aka  
JULIE KAY BAYER, aka  
JULIE KAY VASQUEZ**

Case No. 2011-893

Registered Nurse License No. 438377

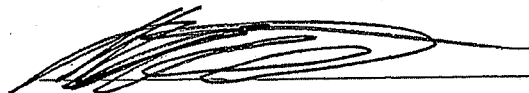
Respondent.

**DECISION**

The attached Stipulated Surrender of License and Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on July 3, 2012.

IT IS SO ORDERED this July 3, 2012.



Erin Niemela  
Temporary Chair  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California

1 KAMALA D. HARRIS  
Attorney General of California  
2 LINDA K. SCHNEIDER  
Supervising Deputy Attorney General  
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*Attorneys for Complainant*  
8

9 **BEFORE THE**  
10 **BOARD OF REGISTERED NURSING**  
11 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2011-893

13 **JULIE KAY CARMEAN,**  
14 **AKA JULIE KAY REICHER,**  
15 **AKA JULIE KAY BAYER,**  
16 **AKA JULIE KAY VASQUEZ**  
33685 Madera de Playa  
Temecula, CA 92592

**STIPULATED SURRENDER OF  
LICENSE AND ORDER**

17 **Registered Nurse License No. 438377**

18 Respondent.  
19

20 In the interest of a prompt and speedy resolution of this matter, consistent with the public  
21 interest and the responsibility of the Board of Registered Nursing of the Department of Consumer  
22 Affairs the parties hereby agree to the following Stipulated Surrender of License and Order which  
23 will be submitted to the Board for approval and adoption as the final disposition of the  
24 Accusation.

25 **PARTIES**

26 1. Louise R. Bailey, M.Ed., RN (Complainant) is the Executive Officer of the Board of  
27 Registered Nursing. She brought this action solely in her official capacity and is represented in  
28 ///

1 this matter by Kamala D. Harris, Attorney General of the State of California, by Loretta A. West,  
2 Deputy Attorney General.

3 2. Julie Kay Carmean, aka Julie Kay Reicher, aka Julie Kay Bayer, aka Julie Kay  
4 Vasquez (Respondent) is representing herself in this proceeding and has chosen not to exercise  
5 her right to be represented by counsel.

6 3. On or about March 31, 1989, the Board of Registered Nursing issued Registered  
7 Nurse License No. 438377 to Respondent. The Registered Nurse License was in full force and  
8 effect at all times relevant to the charges brought in Accusation No. 2011-893 and will expire on  
9 April 30, 2013, unless renewed.

#### 10 JURISDICTION

11 4. On May 3, 2011, Accusation No. 2011-893 was filed before the Board of Registered  
12 Nursing (Board), Department of Consumer Affairs, and is currently pending against Respondent.  
13 The Accusation and all other statutorily required documents were properly served on Respondent  
14 on May 3, 2011. Respondent timely filed her Notice of Defense contesting the Accusation. A  
15 copy of Accusation No. 2011-893 is attached as Exhibit A and incorporated by reference.

#### 16 ADVISEMENT AND WAIVERS

17 5. Respondent has carefully read, and understands the charges and allegations in  
18 Accusation No. 2011-893. Respondent also has carefully read, and understands the effects of this  
19 Stipulated Surrender of License and Order.

20 6. Respondent is fully aware of her legal rights in this matter, including the right to a  
21 hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at  
22 her own expense; the right to confront and cross-examine the witnesses against her; the right to  
23 present evidence and to testify on her own behalf; the right to the issuance of subpoenas to  
24 compel the attendance of witnesses and the production of documents; the right to reconsideration  
25 and court review of an adverse decision; and all other rights accorded by the California

26 Administrative Procedure Act and other applicable laws.

27 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and  
28 every right set forth above.

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13. This Stipulated Surrender of License and Order is intended by the parties to be an integrated writing representing the complete, final, and exclusive embodiment of their agreement. It supersedes any and all prior or contemporaneous agreements, understandings, discussions, negotiations, and commitments (written or oral). This Stipulated Surrender of License and Order may not be altered, amended, modified, supplemented, or otherwise changed except by a writing executed by an authorized representative of each of the parties.

14. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order:

**ORDER**

IT IS HEREBY ORDERED that Registered Nurse License No. 438377, issued to Respondent Julie Kay Carmean, aka Julie Kay Reicher, aka Julie Kay Bayer, aka Julie Kay Vasquez, is surrendered and accepted by the Board of Registered Nursing.

1. The surrender of Respondent's Registered Nurse License and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with the Board of Registered Nursing.

2. Respondent shall lose all rights and privileges as a registered nurse in California as of the effective date of the Board's Decision and Order.

3. Respondent shall cause to be delivered to the Board her pocket license and, if one was issued, her wall certificate on or before the effective date of the Decision and Order.

4. If Respondent ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked license in effect at the time the petition is filed, and all of the charges and allegations contained in Accusation No. 2011-893 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

5. If and when Respondent's license is reinstated, she shall pay to the Board costs associated with its investigation and enforcement pursuant to Business and Professions Code

1 section 125.3 in the amount of \$7,534.00 (seven thousand five hundred twenty four dollars).  
2 Respondent shall be permitted to pay these costs in a payment plan approved by the Board.  
3 Nothing in this provision shall be construed to prohibit the Board from reducing the amount of  
4 cost recovery upon reinstatement of the license.

5 6. If Respondent should ever apply or reapply for a new license or certification, or  
6 petition for reinstatement of a license, by any health care licensing agency in the State of  
7 California, all of the charges and allegations contained in Accusation, No. 2011-893 shall be  
8 deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of  
9 Issues or any other proceeding seeking to deny or restrict licensure.

10 7. Respondent shall not apply for licensure or petition for reinstatement for two (2)  
11 years from the effective date of the Board of Registered Nursing's Decision and Order.

12 ACCEPTANCE

13 I have carefully read the Stipulated Surrender of License and Order. I understand the  
14 stipulation and the effect it will have on my Registered Nurse License. I enter into this Stipulated  
15 Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound  
16 by the Decision and Order of the Board of Registered Nursing.

17  
18 DATED: 12/13/2011

Julie Kay Carmean  
JULIE KAY CARMEAN,  
AKA JULIE KAY REICHER,  
AKA JULIE KAY BAYER,  
AKA JULIE KAY VASQUEZ  
Respondent

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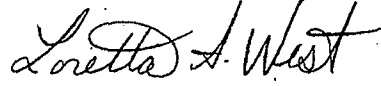
ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted  
for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

Dated: 12/16/2011

Respectfully submitted,

KAMALA D. HARRIS  
Attorney General of California  
LINDA K. SCHNEIDER  
Supervising Deputy Attorney General

  
LORETTA A. WEST  
Deputy Attorney General  
*Attorneys for Complainant*

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**Exhibit A**

**Accusation No. 2011-893**

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1 KAMALA D. HARRIS  
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2 LINDA K. SCHNEIDER  
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3 State Bar No. 101336  
AMANDA DODDS  
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*Attorneys for Complainant*

9 **BEFORE THE**  
10 **BOARD OF REGISTERED NURSING**  
11 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. **2011-893**

13 **JULIE KAY CARMEAN,**  
14 **aka JULIE KAY REICHER, aka JULIE**  
**KAY BAYER, aka JULIE KAY VASQUEZ**  
15 **29730 Cottonwood Cove Drive**  
**Menifee, CA 92583**

**A C C U S A T I O N**

16 **Registered Nurse License No. 438377**

17 Respondent.

18  
19 Complainant alleges:

20 **PARTIES**

21 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her  
22 official capacity as the Executive Officer of the Board of Registered Nursing, Department of  
23 Consumer Affairs.

24 2. On or about March 31, 1989, the Board of Registered Nursing issued Registered  
25 Nurse License Number 438377 to Julie Kay Carmean, also known as Julie Kay Reicher, also

26 known as Julie Kay Bayer, also known as Julie Kay Vasquez (Respondent). The Registered  
27 Nurse License was in full force and effect at all times relevant to the charges brought herein and  
28 will expire on April 30, 2011, unless renewed.

## JURISDICTION

3. This Accusation is brought before the Board of Registered Nursing (Board), Department of Consumer Affairs, under the authority of the following laws. All section references are to the Business and Professions Code unless otherwise indicated.

4. Section 2750 of the Code provides, in pertinent part, that the Board may discipline any licensee, including a licensee holding a temporary or an inactive license, for any reason provided in Article 3 (commencing with section 2750) of the Nursing Practice Act.

5. Section 2764 of the Code provides, in pertinent part, that the expiration of a license shall not deprive the Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811, subdivision (b) of the Code, the Board may renew an expired license at any time within eight years after the expiration.

## STATUTORY PROVISIONS

6. Section 2761 of the Code states:

The board may take disciplinary action against a certified or licensed nurse or deny an application for a certificate or license for any of the following:

(a) Unprofessional conduct . . .

## COSTS

7. Section 125.3 of the Code provides, in pertinent part, that the Board may request the administrative law judge to direct a licentiate found to have committed a violation or violations of the licensing act to pay a sum not to exceed the reasonable costs of the investigation and enforcement of the case.

## FACTUAL ALLEGATIONS

8. Respondent was employed by the Visiting Nurse Association of the Inland Counties (VNAIC) as a Home Health Registered Nurse Case Manager starting September 15, 2008. The job description required that Respondent plan, implement, and assess the plan of care for each patient in her caseload, and utilize principles of community health nursing to provide skilled nursing care to patients.

1           9.     On September 15, 2008, Respondent signed an acknowledgment that she received a  
2 copy of the VNAIC Personnel Policy Manual, and that she would promptly read its contents and  
3 report to her supervisor or human resources if she had any questions.

4           10.   Number 5.08 of the VNAIC Personnel Policy Manual, entitled *Gratuities* specifically  
5 states that Respondent "cannot, under any circumstances, accept cash gifts in any amount. If  
6 someone offers [Respondent] such a gift, [Respondent] should explain to the person that  
7 accepting the gift would be against Agency policy."

8           11.   Number 5.01 of the VNAIC Personnel Policy Manual, entitled *Agency/Patient*  
9 *Relations* specifically required that Respondent "maintain appropriate professional boundaries  
10 with co-workers, patients and their families."

11          12.   Number 6.05 of the VNAIC Personnel Policy Manual, entitled *Ethics, Agency* again  
12 stated that it was imperative Respondent "maintain appropriate professional boundaries with co-  
13 workers, patients and their families."

14          13.   Number 5.12 of the VNAIC Personnel Policy Manual, entitled *Prohibited Conduct*,  
15 stated that the following acts, among others, constituted prohibited conduct:

- 16           • Violation of Agency safety rules, or engaging in conduct that creates a serious health  
17 or safety hazard;
- 18           • Violation of the tenets of Agency policies and procedures, particularly those outlined  
19 in this Manual;
- 20           • Failure to comply with the Agency's standards of conduct, including the written Code  
21 of Conduct;
- 22           • Theft, lying or any other form of dishonesty;
- 23           • Accepting a gift or gratuity offered by a current or former patient, client, vendor or  
24 supplier;
- 25           • Unsatisfactory, negligent or substandard job performance and/or unprofessional  
26 conduct;
- 27           • Inability to establish and maintain effective working relationships with managers, co-  
28 workers, patients and others involved in the workplace.

1           14. In January 2010, Respondent was assigned to provide home assessments to a  
2 VNAIC client, an 84-year old male with lung cancer (hereinafter "patient"), who was  
3 receiving chemotherapy treatments. He had additional serious health problems. The  
4 patient's wife had passed away in 2005 and he had no children, and no relatives living  
5 nearby. The patient lived alone; he was frail and dependent on home-based nursing care to  
6 provide for his health and well-being.

7           15. On or about May 14, 2010, the VNAIC Human Resources Director was alerted  
8 that Respondent had received thousands of dollars in money and gifts from the patient. On  
9 May 17, 2010, a VNAIC representative and a social worker met with the patient who stated  
10 that Respondent divulged personal information about herself and frequently discussed her  
11 financial difficulties. The patient gave Respondent approximately \$12,000 in cash towards  
12 a down payment on her house, and approximately \$12,000 in cash to purchase a car.  
13 Respondent took the patient to several furniture stores where he purchased furniture for  
14 Respondent's home using cash and a credit card. Respondent took the patient to church  
15 several times, and to lunches afterwards (at his expense). Respondent also took the patient  
16 to her home on numerous occasions. The patient gave Respondent \$80,000 in cash to open  
17 a safe deposit box in Respondent's name. When Respondent stopped coming for visits, or  
18 returning his calls, he became upset and called Respondent demanding his money back.  
19 Respondent took the patient to the bank to empty the safe deposit box. She threw \$30,000  
20 in his lap, which was the amount remaining in the safe deposit box. The patient felt that  
21 Respondent was no longer interested in him because she had a new boyfriend, and that she  
22 had taken him for a sucker.

23           16. On May 17, 2010, the Director and representatives met with Respondent to  
24 discuss the allegations. Respondent denied any wrongdoing, stating that she did not take  
25 any money from the patient; she opened a safe deposit box in both their names, but took her  
26 name off the next day; and that she used her own money from a settlement for the down  
27 payment for her home, for the car, and for the furniture. Respondent stated that the patient  
28 bought furniture for her and had it delivered to her home without her knowledge, but that

1 she immediately paid him for the furniture. Respondent stated that taking the patient on  
2 outings was not a problem because it was done on her own time. Respondent was  
3 immediately suspended; her employment with VNAIC was terminated on May 24, 2010.  
4 VNAIC filed a complaint with the Board dated June 9, 2010.

5 **Division of Investigation Case No. 10-02007-RN**

6 17. An investigator with the Division of Investigation (DOI) was assigned to investigate  
7 the complaint made by VNAIC to the Board. On or about December 8, 2010, the investigator  
8 interviewed Respondent who related the following information:

9 18. Respondent stated that as a case manager, she was required to make two visits per  
10 month, however she began visiting the patient more frequently in her off time. Respondent felt  
11 sorry for the patient, and took him to her church in Menifee at least three times. After the third  
12 time, they went to lunch, which he paid for. Respondent recalled that she and the patient went to  
13 dinner at least twice, and she took him to doctor appointments two or three times.

14 19. Respondent and the patient once had lunch at the Menifee Country Club. While  
15 there, the patient fell and Respondent took him to the doctor. He was transferred to the Veteran's  
16 Administration Hospital. Respondent picked up the patient at the V.A. Hospital and took him  
17 home.

18 20. Respondent's mother picked up the patient at his home and brought him to  
19 Respondent's home where they celebrated both their birthdays.

20 21. Respondent stated that the patient wanted to purchase a new chair, so she took him to  
21 a furniture store. While there, she was admiring a dining room set. To her surprise, the patient  
22 purchased the set and had it delivered to her house. She tried to pay him back, but he would not  
23 accept any money.

24 22. Respondent stated that the patient gave her \$15,000 for a down payment for her  
25 house, and \$23,000 to purchase a dependable car.

26 23. The patient requested that Respondent open a safe deposit box in her name. She took  
27 the patient to a bank near her home and deposited \$80,000. Respondent stated that the patient  
28 insisted she take \$20,000 of the money to pay off her bills, which she used to pay off her credit

1 cards. She also took out money for her own personal use because that was what the patient  
2 wanted her to do.

3 24. Over the course of her visits, Respondent stated that the patient became obsessed with  
4 her. He constantly called her work cell phone, sometimes calling three or four times a day, and  
5 was asking too much of her time. The patient called Respondent one day requesting that she take  
6 him to the bank to withdraw the money in the safe deposit box. Respondent gave the patient the  
7 remainder of the money, took him home, and that was the last time she saw him.

8 25. By Respondent's own admission, she received well over \$100,000 in "gratuities"  
9 from the patient.

10 26. In Respondent's "Skilled Nursing Recert" of the patient dated March 3, 2010,  
11 she stated that the patient displayed "No signs of abuse/neglect/exploitation."

12 27. The Riverside County Sheriff's Department contacted both Respondent and the  
13 patient. According to an interview with the patient, he first came into contact with  
14 Respondent in February 2010. He described her as very attentive, and that he liked her very  
15 much. The next time he saw Respondent was approximately one month later. When she  
16 entered his house, Respondent gave him a big hug, which he liked. Respondent told the  
17 patient that her relationship with her boyfriend was ending and that she needed to find a  
18 new place to live or she would be homeless. The patient became concerned for her welfare.

19 28. The patient divulged to Respondent that he had \$143,000 in a bank account in  
20 Long Beach which was being overseen by his step-nephew. The patient went to Long  
21 Beach and withdrew \$135,000 in cash and stored it in a cardboard box in a bedroom closet.

22 29. Respondent began visiting him more frequently, at least once a week. She took  
23 him to local shops and businesses. Respondent told the patient that she was having car  
24 problems, so he gave her \$14,000 to buy a better car. Respondent gave him a big hug.

25 30. In March 2010, Respondent told the patient that she had always dreamed of  
26 buying a home and took the patient to a property in Menifee she wished to purchase. She  
27 needed \$40,000 cash as a down payment; the patient surprised her and gave her the money  
28 she needed.

1        31. Respondent was now visiting the patient one or two days per week; he began to  
2 feel he was a part of her life. In April 2010, they went to several furniture stores and he  
3 paid for anything she wanted. The patient stated he spent thousands of dollars on furniture  
4 for Respondent.

5        32. The patient asked Respondent to open a safe deposit box in her name and gave  
6 her \$80,000 to deposit. He wanted to avoid having his name on the bank documents. He  
7 observed Respondent carry the \$80,000 to the safe deposit box. The patient grew  
8 suspicious that Respondent was seeing another man. During one of her unscheduled visits,  
9 he asked Respondent how much money was left in the safe deposit box. Respondent told  
10 him that she had paid her mortgage two years in advance and that there was less than  
11 \$30,000 left. The patient had Respondent take him to the bank and retrieve his money. She  
12 went into the bank and returned with \$30,000 in cash in a brown paper bag. Respondent  
13 took the patient home and dropped him off on the sidewalk. He never saw her again.

14        33. In an interview with Respondent conducted by the Riverside County Sheriff's  
15 Department, Respondent confirmed that she accepted gifts and money from the patient.  
16 Respondent stated that "morally" she should not have accepted the gifts because of the  
17 patient/nurse relationship. Respondent also stated that she felt she should return a portion  
18 of the money spent on her, but that she has only been able to save about \$6,000.

19        34. In Respondent's written declaration dated December 8, 2010, Respondent stated that  
20 her first outing with the patient, when she took him to church, occurred when she was no longer  
21 his case worker. She describes her relationship with the patient as a "friendship" and she took the  
22 patient to her home approximately eight times. Respondent's mother brought the patient to  
23 Respondent's home for a birthday party, and dropped him off at his home after the party.  
24 Respondent described the circumstances that led to opening a safe deposit account in her name to  
25 deposit \$80,000 of the patient's money. According to Respondent, the patient stated that "He did  
26 not want any of it and had always wanted to give it to someone who deserved it and became  
27 adamant that I have it." Respondent further stated that the patient consistently told her to use the  
28 money to pay off her bills, get furniture for her house, and buy a new car. Respondent stated she

1 refused to touch his money at first, telling him "[She] had no right to spend his money." The  
2 patient told Respondent that she was not being a friend if she did not grant his wish and take the  
3 money. Respondent stated that the patient insisted over and over that she take the money so that  
4 she could get a fresh start. At some point, the patient felt he was not receiving the attention he  
5 wanted from Respondent and began leaving "negative" messages on her cell phone. Respondent  
6 offered to assist in arranging transportation for him; but he became angry. Respondent stated that  
7 at that time, she offered to pay the patient back "all the money he loaned [her]" but he refused.  
8 Respondent returned the money remaining in the safe deposit box, but stated she could no longer  
9 take him places as he was becoming too demanding of her time. Respondent admitted that her  
10 actions were unethical. She felt that she never wronged anyone and was only being kind to a  
11 person who needed a friend. Respondent stated that the "approximate" amount of money she  
12 received from the patient was \$30,000. The rest she "either returned to him or paid him back."

13 **CAUSE FOR DISCIPLINE**

14 **(Unprofessional Conduct)**

15 35. Respondent is subject to disciplinary action under section 2761, subdivision (a)(1) of  
16 the Code for unprofessional conduct, with respect to her conduct toward her patient, and VNAIC  
17 client, as detailed in paragraphs 8-34, above and as follows:

- 18 a. Respondent knowingly engaged in conduct that violated agency safety rules  
19 when she transported the patient in her personally-owned vehicle for unauthorized outings, and  
20 allowed her mother to do the same. Respondent took the patient on an unauthorized outing where  
21 he fell and was injured, and required hospitalization;
- 22 b. Respondent violated the agency's policies, procedures and standards of conduct  
23 when she formed a personal relationship with a patient;
- 24 c. Respondent engaged in lying and dishonesty during interviews with VNAIC  
25 representatives and the DOI investigator related to the investigation of this matter;
- 26 d. Respondent accepted gifts and gratuities from a patient;
- 27 e. Respondent failed to maintain appropriate professional boundaries.

28 ///



36. Respondent violated the nurse/patient relationship for her own benefit, and accepted large sums of cash and gifts from an elderly, terminally ill patient, as detailed in paragraphs 8-34, above. Nurse/patient relationships have, as their foundation, the goal of alleviating suffering, and protecting and promoting the health and safety of the patient. Respondent was unethical in that she failed to respect the dignity of her patient, or protect his best interests. Respondent exploited the patient's reliance on her for care and companionship, and allowed him to believe they had a personal relationship so that she could receive the gratuities. Respondent's actions exhibited extremely poor judgment, and they violated the moral and ethical standards of the nursing profession.

## PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking or suspending Registered Nurse License Number 438377, issued to Julie Kay Carmean, also known as Julie Kay Reicher, also known as Julie Kay Bayer, also known as Julie Kay Vasquez;

2. Ordering Julie Kay Carmean to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

3. Taking such other and further action as deemed necessary and proper.

DATED:

5/3/11

LOUISE R. BAILEY, M.ED., RN  
Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
*Complainant*

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